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Counsel for Defendant  
Transportation Agency for Monterey County

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

MUSEUM OF HANDCAR  
TECHNOLOGY, LLC,

Plaintiff,

v.

TRANSPORTATION AGENCY FOR  
MONTEREY COUNTY, AND THE  
CITY OF MARINA,

Defendants.

*ASSIGNED TO JUDGE EUMI K LEE*

Civil Action No.: 5:24-cv-08598

**MOTION TO WITHDRAW AS  
DEFENDANT**  
**TRANSPORTATION AGENCY  
FOR MONTEREY COUNTY'S  
COUNSEL; [PROPOSED] ORDER**

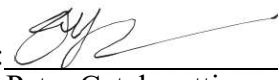
Pursuant to Civil Local Rule 5-1(c)(2)(E), and 11-5, the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker LLP ("Wilson") hereby moves to withdraw as counsel for Transportation Agency for Monterey County ("TAMC"). Heather Mills (SBN 190950), Robin Diem (SBN 204162), Paul O'Keefe (SBN 253111), and Makala Furse (SBN 340406) from the law firm of Skane Mills will substitute in as counsel of record for TAMC.

Pursuant to Civil Local Rule 11-5(a), Wilson provided written notice of its withdrawal to TAMC and all parties in this lawsuit. (Decl. of Counsel, Ex. A.) TAMC understands and agrees that Skane Mills will represent TAMC in this action.

Accordingly, Wilson respectfully requests that the Court grants its motion to withdraw as TAMC's counsel of record.

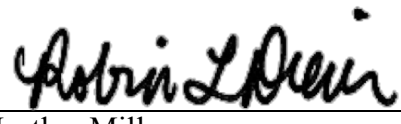
Dated: March 24, 2025

Respectfully submitted,  
**WILSON, ELSE, MOSKOWITZ,  
EDELMAN & DICKER LLP**

By:   
Peter Catalanotti  
Madonna Herman  
Quincy Pham  
Inna Nytochka  
Former Legal Representatives for  
Defendant Transportation Agency for  
Monterey County

Dated: March 24, 2025


**Skane Mills**

By:   
Heather Mills  
Robin L. Diem  
Paul O'Keefe  
Makala Furse  
New Legal Representatives for  
Defendant Transportation Agency for  
Monterey County

[TAMC's signature on next page]

1 Dated: March 24, 2025

**Transportation Agency for Monterey  
County**

2  
3 By:   
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5 Todd Muck, representative for  
6 Transportation Agency for Monterey  
7 County  
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**[PROPOSED] ORDER**

Having considered Wilson, Elser, Moskowitz, Edelman & Dicker LLP's ("Wilson") motion, and good cause appearing therefore, the Court hereby GRANTS Wilson's motion to withdraw as counsel of record for Transportation Agency for Monterey County.

**IT IS SO ORDERED.**

Date: \_\_\_\_\_

\_\_\_\_\_  
Hon. Eumi Lee  
Judge of the Northern District  
Court of California, San Jose Division


**DECLARATION OF COUNSEL**

I, Quincy N. Pham, declare as follows:

I am an attorney licensed to practice before all of the courts in the State of California. I am employed by WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP (“Wilson”). I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath. I make this declaration in support of the Wilson’s motion to withdraw as counsel for Defendant Transportation Agency of Monterey County (“TAMC”).

1. On February 27, 2025, I, along with TAMC’s representatives, Todd Muck and Shane Strong, were informed that Wilson will be replaced by a new law firm to represent them in this action.
2. On March 19, 2025, I emailed Mr. Muck and Mr. Strong that Wilson will withdraw as TAMC’s counsel and that Heather Mills, Robin Diem, Paul O’Keefe, and Makala Furse from Skane Mills will substitute in to represent TAMC in this action. On the same day, I emailed all parties in this action to inform them of Wilson’s withdrawal and Skane Mills’ substitution as TAMC’s counsel. A true and correct copy of Wilson’s written email notice to TAMC and all parties are attached this declaration as **Exhibit A**.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 24, 2025, in San Francisco, California.

  
Quincy N. Pham, Declarant

# **Exhibit A**

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m: 562-212-9242  
f: 213-452-1201  
[rdiem@skanemills.com](mailto:rdiem@skanemills.com)  
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**From:** "Pham, Quincy" <[Quincy.Pham@wilsonelser.com](mailto:Quincy.Pham@wilsonelser.com)>  
**Date:** Wednesday, March 19, 2025 at 1:49 PM  
**To:** Todd Muck <[todd@tamcmonterey.org](mailto:todd@tamcmonterey.org)>, "strongse1@countyofmonterey.gov" <[StrongSE1@countyofmonterey.gov](mailto:StrongSE1@countyofmonterey.gov)>  
**Cc:** "Herman, Madonna" <[Madonna.Herman@wilsonelser.com](mailto:Madonna.Herman@wilsonelser.com)>, Heather Mills <[hills@skanemills.com](mailto:hills@skanemills.com)>, "Robin L. Diem" <[rdiem@skanemills.com](mailto:rdiem@skanemills.com)>  
**Subject:** [External Sender] Museum v. TAMC (substitution of counsel)

Todd/Shane:

Hope you are doing well. Pursuant to Civil L.R. 11-5, we are required to provide you written notice of our withdrawal in this lawsuit.

As you know, Heather Mills and Robin Diem from Skane Mills will substitute in as counsel for TAMC.

Best,  
Quincy

Quincy Pham  
Attorney at Law  
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